

In re Terrorist Attacks on September 11, 2001

As relates to: 03 MDL 1570 (GBD) (SN)

HORACE MORRIS, et al.

Civil Docket Number: 18-cv-05321

PLAINTIFFS,

THIRD NOTICE OF AMENDMENT

v.

ISLAMIC REPUBLIC OF IRAN,

ECF CASE

DEFENDANT.

This document relates to:

Horace Morris, et al. v. Islamic Republic of Iran, No. 1:18-cv-05321 (GBD) (SN).

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 6 (the “Underlying Complaint”), as permitted and approved by the Court’s Order of May 25, 2018, ECF No. 4010, read with the Order dated April 27, 2018, ECF No. 3982. Upon the filing of this Notice of Amendment, the Underlying Complaint is deemed amended to add the individuals listed below (the “New Plaintiffs”) as plaintiffs raising claims against the Islamic Republic of Iran, and adopting the factual allegations, jurisdictional allegations, and jury trial demand of the Underlying Complaint and *Burnett Iran* Complaint, Docket Number 15-cv-9903 (S.D.N.Y.) (GBD)(SN) (ECF Doc. No. 53), as well as all causes of action specified below. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the Underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

CAUSES OF ACTION

The New Plaintiffs hereby adopt and incorporate herein by reference the causes of action set forth in the Underlying Complaint and the *Burnett* Iran Complaint, Docket Number 15-cv-9903 (S.D.N.Y.) (GBD)(SN) (ECF Doc. No. 53).

New Plaintiffs are making such claim on the following basis, and incorporate by reference that supplemental information provided in the Identification of New Plaintiffs below, identifying the New Plaintiffs asserted basis for participating in this suit:

- ☐ Estate Wrongful Death Claim by Estate Representative on Behalf of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- ☒ Solatium Claim by Immediate Family Member of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- ☐ Personal Injury Claim by Individual Injured as a result of the September 11, 2001 Terrorist Attacks

IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the Underlying Complaint discussing the decedent and/or the decedent's estate.

	New Plaintiff's Last Name, First Name	State of Residency at Filing (or death)	Citizenship/ Nationality on 9/11/2001	Decedent's Name (alphabetical by last name)	New Plaintiff's Relationship to Decedent	Paragraphs of Complaint Discussing Decedent
						1:18-cv-05321
150	Pabon, Hannah	NJ	United States	Pabon, Israel	Daughter	¶ 27
151	Pabon, Sara	NJ	United States	Pabon, Israel	Daughter	¶ 27
152	Wells, Chin	OK	United States	Pak-Wells, Chin Sun	Brother	¶ 28
153	Wells, Kum Son	OK	Korea	Pak-Wells, Chin Sun	Mother	¶ 28

	New Plaintiff's Last Name, First Name	State of Residency at Filing (or death)	Citizenship/ Nationality on 9/11/2001	Decedent's Name (alphabetical by last name)	New Plaintiff's Relationship to Decedent	Paragraphs of Complaint Discussing Decedent 1:18-cv-05321
154	Patrocino, Keyla	NY	Dominican Republic	Patrocino, Manuel D.	Daughter	¶ 31
155	Pearlman, Barry	NY	United States	Pearlman, Richard A.	Father	¶ 32
156	Pearlman Mason, Lisa	NY	United States	Pearlman, Richard A.	Sister	¶ 32
157	Knepper, Yolanda	NJ	United States	Perez, Nancy E.	Sister	¶ 34
158	Perez, Berta	NJ	United States	Perez, Nancy E.	Mother	¶ 34
159	Conti, Minerva.	NJ	United States	Perez, Nancy E.	Sister	¶ 34
160	Perry, William	NY	United States	Perry, Emelda	Son	¶ 35
161	Perry, Glen Jr.	NJ	United States	Perry, Glen Sr.	Son	¶ 36
162	Wilt, Meaghan	VA	United States	Perry, Glen Sr.	Daughter	¶ 36
163	Perry, Caitlin	NJ	United States	Perry, Glen Sr.	Daughter	¶ 36
164	Kroupa, Dierdre	NY	United States	Pettit, Glen	Sister	¶ 38
165	Pettit, Neil	NY	United States	Pettit, Glen	Brother	¶ 38
166	Wixted, Jane	NY	United States	Pettit, Glen	Mother	¶ 38
167	Knobel, Vivienne Hoang-Anh	NY	United States	Pham, Tu-Anh	Daughter	¶ 39
168	Olivieri, Roxana	NY	United States	Porras, Giovanna	Sister	¶ 41
169	Pugliese, Josephine	NY	United States	Pugliese, Robert D.	Mother	¶ 43
170	Pugliese, Lisa	CA	United States	Pugliese, Robert D.	Daughter	¶ 43
171	Pugliese, Michael	TX	United States	Pugliese, Robert D.	Son	¶ 43
172	Pugliese, Dennis	NY	United States	Pugliese, Robert D.	Son	¶ 43
173	Quappe, Charles	FL	United States	Quappe, Lincoln	Father	¶ 46 & 47
174	O'Connell, Tara	NY	United States	Quappe, Lincoln	Sister	¶ 46 & 47

Dated: June LP 2018

Respectfully submitted,

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COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on June ~~14~~, 2018, I caused the foregoing Notice of Amendment, to be served via the Court's ECF system to all counsel of record in Case Number 03-MDL-1570 (GBD) (SN).



Jerry S. Goldman

